

EX PARTE WILKES, ARTIS, HEDRICK & LANE

WILKES, ARTIS, HEDRICK & LANE

CHARTERED

ATTORNEYS AT LAW

SUITE 1100

1666 K STREET, N. W.

WASHINGTON, D. C. 20006-2897

(202) 457-7800

September 22, 1998

CABLE ADDRESS: WILAN  
FAX: 202-457-7814

ROBERT M. GURSS  
202-457-7329

ANNAPOLIS, MARYLAND  
BETHESDA, MARYLAND  
FAIRFAX, VIRGINIA  
GREENBELT, MARYLAND  
WALDORF, MARYLAND

RECEIVED

SEP 22 1998

Federal Communications Commission  
Office of Secretary

BY HAND

Magalie Roman Salas, Esq., Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

ORIGINAL

Dear Ms. Salas:

RE: Written Ex Parte Communication in CC Docket 94-102

This is to inform the Commission that the attached letter was delivered by the Association of Public-Safety Communications Officials-International, Inc. ("APCO") to Chairman William Kennard on September 21, 1998. Two copies of the letter are attached for submission to the record in the above-referenced proceeding.

Please contact the undersigned should you have any questions.

Respectfully submitted,



Robert M. Gurss  
Counsel for APCO

cc: Chairman William Kennard  
Mr. Ari Fitzgerald

doc #66367

No. of Copies rec'd  
List ABCDE

041

EX HAPIL OR LATE FILED

APCO INTERNATIONAL  
HEADQUARTERS  
2040 S. RIDGEWOOD AVE.  
SOUTH DAYTONA, FL 32119-8437  
(888) APCO-9-1-1 OR (904) 322-2500  
FAX: (904) 322-2501

**ASSOCIATION OF  
PUBLIC-SAFETY  
COMMUNICATIONS  
OFFICIALS  
INTERNATIONAL, INC.**

APCO INTERNATIONAL  
GOVERNMENT AFFAIRS OFFICE  
1666 K STREET, NW, SUITE 1100  
WASHINGTON, D.C. 20006-2866  
(202) 887-5415

**RECEIVED**

**SEP 22 1998**

Federal Communications Commission  
Office of Secretary

September 21, 1998

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chairman Kennard:

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Association of State Nine One One Administrators ("NASNA") have consistently supported the concept of establishing a threshold signal level for adequate communications with Public Safety Answering Points ("PSAPs") when the digits 9-1-1 are dialed from an analog cellular telephone. We also believe that where such a threshold level is not met, there needs to be an alternative path to ensure that the 9-1-1 call will get through to the PSAP. The appropriate threshold and the alternative path for completing calls that fall below that threshold are matters that require analysis and validation by appropriate technical bodies.

We have not supported the "strongest signal" proposal offered by the Ad Hoc Alliance for Public Access to 911 ("Alliance"), due to concerns regarding the impact on 9-1-1 networks. We documented our concerns with that proposal in a submission to the Commission on February 23, 1998 from APCO, NASNA and NENA, the National Emergency Number Association. More recently, on September 17, the Alliance submitted a modified proposal to the Commission which reflects at least some aspects of an "adequate signal" approach. While the Alliance inappropriately attempts to characterize our position regarding this latest proposal, we do acknowledge that it is a significant step in the right direction. The Alliance now appears to agree that the best solution is to attempt to establish a threshold for "adequate" communications (which may not be on the "strongest

President

Jack Keating  
City of West Covina  
P.O. Box 1440  
West Covina, CA 91783-1440  
(626) 814-8580  
Fax: (626) 813-8674  
[president@apcointl.org](mailto:president@apcointl.org)

Executive Director  
Christopher R. Bevevino, CAE  
(888) APCO-9-1-1  
[bcvcrinoe@apcointl.org](mailto:bcvcrinoe@apcointl.org)

*APCO International - is the world's oldest and largest not-for-profit professional organization dedicated to the enhancement of public safety communications.*

*With more than 12,000 members world wide, APCO International exists to serve the people who manage, operate, maintain, and supply the communications systems used to safeguard the lives and property of citizens everywhere.*

signal") and an alternative path to the PSAP for when that threshold is not met. However, we are not prepared to support the specifics of the modified Alliance proposal, which still contains some significant technical problems.

We believe that the Commission needs to move forward on this issue, which has already diverted attention from pressing matters regarding implementation of Phase I and Phase II. Therefore, we urge that the Commission charge appropriate technical bodies with the task of determining a recommended threshold for adequate signal level, and process for delivering to the PSAP 9-1-1 calls that fall below that threshold. In addition to the relevant Telecommunications Industry Association standards committee (TR.45), this issue should be referred to WEIAD (Wireless Enhanced 9-1-1 Implementation Ad Hoc) which was formed to address technical wireless/9-1-1 issues. The Alliance proposal, and technical solutions, should be examined and resolved by WEIAD and TR.45 as quickly as possible.

We remained committed to working with the Commission and other parties to address this and other 9-1-1 issues.

Respectfully submitted,

Jack Keating  
President  
APCO

James Beutelspacher  
President  
NASNA

Cc: Leah Senitte  
President  
NENA